

APPENDIX A

CONSULTATION AND COORDINATION WITH THE COOPERATING AGENCIES

INTRODUCTION

By special agreement as provided under 40 CFR §1501.6 and §1508.5, the National Park Service (NPS), the lead agency in this Environmental Impact Statement (EIS), has collaborated with nine cooperating agencies in the EIS process: the U.S. Forest Service; the States of Idaho, Montana, and Wyoming; and the Counties of Gallatin and Park, Montana, Park and Teton, Wyoming, and Fremont, Idaho. The Council on Environmental Quality (CEQ) regulations for implementing National Environmental Policy Act (NEPA) define a cooperating agency as any agency that has jurisdiction by law or, in this case, special expertise for proposals covered by NEPA. See Chapter I for further discussion of cooperating agency involvement and their identified areas of expertise. The Memorandums of Agreement for all agencies were published in the Draft Environmental Impact Statement (DEIS), Volume II, Appendix I. The following timetable illustrates the extent to which the NPS interacted with cooperating agencies subsequent to The Fund for Animals lawsuit.

Table 1. Timetable of events

Date	Event/Action
12/1997-1/1998	The NPS grants cooperating agency status to three adjoining states, five adjoining counties and USFS. [†]
2/1998	Cooperators asked to submit comments on whether to produce a General Management Plan or a Winter Use Plan.
2/13/1998	First Winter Use Cooperators Meeting held in Bozeman (News Release).
4/14/1998	Federal Register "Notice of Intent" on <i>Winter Use Plans/EIS</i> published (News release 4/15/1998).
4/30/1998	Conference call with cooperators.
5/22/1998	Meeting with all cooperators in Jackson, Wyoming.
6/1/1998	Cooperators consulted on dates and locations for scoping meetings, invited to attend.
6/14-7/16/1998	Open house scoping meetings held at 16 locations across country (News Releases 6/4, 6/15 and 7/1/1999).
7/18/1998	Scoping process ends on <i>Winter Use Plans/EIS</i> .
7/31/1999	Cooperators asked to review the draft study design, draft sample plan and draft questionnaire for economic study. At request of the State agencies, The NPS contracts with three experts designated by the states to provide peer review of the study and draft report.
8/5/1998	Conference calls with all cooperators.
8/12/1998	Hard copies of all scoping comments provided to cooperators upon their request.
8/26-27/1998	Meeting with cooperators in Cody, Wyoming.
9/3/1998	Copies of <i>YNP[†] Winter Survey (1997-1998)</i> and report <i>Social Conditions of Winter Use in YNP (1997)</i> sent to cooperators.
9/11/1998	Draft scoping content summary analysis and copies of documents, which define the NPS mission and goals sent to cooperators.
9/29/1998	<i>Preliminary Bibliography for Winter Use Research</i> sent to cooperators.
10/1/1998	Final summary of issues identified during scoping sent to cooperators.
10/14-16/1998	Alternatives Concept Workshop with cooperators held in Idaho Falls.
Fall 1998	Deputy Regional Director Mike Snyder agrees to Paul Kruse request to allow

Date	Event/Action
	cooperators 5 working days response time on any request for input from the NPS.
11/20/1998	Four draft preliminary winter use alternatives released to cooperators for review and input.
12/7/1998	Comments due from cooperators on draft preliminary winter use alternatives.
12/18/1998	Clifford Hawkes letter to cooperators setting tentative 1/25/1999 date for release of draft alternatives to cooperators.
1/27/1999	Regional Director John Cook letter to cooperators regarding delay in release of draft winter use alternatives.
2/26/1999	Regional Director John Cook letter to cooperators regarding continued delay in release of draft winter use alternatives.
3/5/1999	Department of Justice (DOJ) request extension of deadlines for Draft Plans/EIS, Final Plans/EIS and ROD.
3/23/1999	The Fund for Animals agrees to extension of deadlines, but with stipulations the NPS finds unacceptable.
4/2/1999	Regional Director John Cook letter to the NPS Director Stanton requesting release of draft alternatives to cooperators.
4/19/1999	Draft Winter Use alternatives released to cooperators for review and input.
5/19/1999	Revised <i>Winter Use Plans/EIS</i> timeline sent to cooperators.
5/24/1999	Comments due from cooperators on draft winter use alternatives.
6/16/1999	Regional Director John Cook response letters to cooperators regarding comments on draft alternatives.
6/24/1999	Preliminary <i>Draft Winter Use Plans/EIS</i> released to cooperators for review and comment.
6/28/1999	Paul Kruse response to YNP Superintendent Finley's 5/18 response to Senators Burns, Enzi, Craig, & Crapo.
7/1/1999	Comments due from the NPS and cooperators on preliminary <i>Draft Winter Use Plans/EIS</i> .
7/7/1999	YNP Superintendent Finley requests 45-day extension for release of <i>Draft Winter Use Plans/EIS</i> .
7/28/1999	Letter from Superintendent Finley to Paul Kruse responding to Kruse June 28 letter: define CAs roles, clarify EIS schedule and timeframes, and clarify sharing of socio-economic information.
7/30/1999	<i>Draft Winter Use Plans/EIS</i> posted to Internet for public review and comment.
8/10/1999	Letter from Wyoming Governor Geringer to the NPS Intermountain Regional Director John Cook requesting 30-day extension of comment period until Nov. 15.
8/17/1999	Letter to Wyoming Governor Geringer from the NPS Intermountain Regional Director John Cook responding to August 10 letter: granting 30-day extension of comment period.
8/23/1999	CAs provided with raw data from "Winter 1998-99 Visitor Survey Yellowstone, GTNP [†] , and the GYA [†] "
8/25/1999	Printed copies of <i>Draft Winter Use Plans/EIS</i> available.
9/28/1999	Close of public review and comment period on <i>Draft Winter Use Plans/EIS</i> .
9/29/1999	Letter from Wyoming County Commissioners Association to Superintendent Finley about resolution passed by Association in support of Revised Alternative E.

Date	Event/Action
10/12/1999	Fax to CAs regarding extension of comment period on DEIS to 12/01/1999 and letter to CAs to re-confirm meeting times/locations for public hearings on EIS/Plans.
10/18/1999	"Draft Report Winter 1998-99 Visitor Survey Yellowstone, GTNP, and the GYA: Analysis and Results" released to CAs, with request for comments.
10/22/1999	Letter to CAs regarding extension of comment period on DEIS to 12/01/1999.
11/02/1999	Letter from Park County, Wyoming requesting hearing in St. Anthony, Idaho and requesting original DEIS document.
11/03/1999	Letter from Paul Kruse to NPS Director Stanton regarding CA counties' complaint about release of ARD report on the air quality in YNP without providing the report to the CAs for review prior to release to the public.
11/24/1999	Letter from Superintendent Finley to Charles Johnstone, Park County, Wyoming commissioners, responding to November 2, 1999 commissioners' letter: deny additional public hearing in St. Anthony, Idaho and clarify that no known amendments to DEIS made in Washington D.C.
11/30/1999	Fax/letter to CAs regarding extension of comment period on DEIS to December 15
12/08/1999	Letter from Bill Paddleford, Teton County, Wyoming commissioner, regarding concerns about socio-economics impacts
12/13-14/1999	Letters to Superintendent Finley from Park County, Montana and Park County, Wyoming requesting explanation of comment period extension, copies of comments, list of winter use studies completed or to be completed and study abstracts, and all extension requests and approvals
1/26/2000	Letter from Kim Raap, Wyoming CA representative, requesting copies of comments; update of comment tally; list of winter use studies and status, funding sources for studies, study designs; information on the NPS use of 4-stroke Arctic Cat snowmobiles
2/11/2000	"Draft Report Summer 1999 Visitor Survey Yellowstone, GTNP, and the GYA: Analysis and Results" released to CAs with request for their comments
2/25/2000	Fax to CAs to inform them of 03/10/2000 CA meeting in Jackson, Wyoming
3/02/2000	Report: "Air Quality Concerns Related to Snowmobile Usage in National Parks" released to CAs before public release
3/13/2000	Meet with cooperating agencies in Jackson, Wyoming, to inform them of the preferred alternative leaning, and process on comment analysis. Invitation to cooperators to comment. Cooperating agencies provided with copies of comments
3/22/2000	Letter to Don Barry, Assistant Secretary of the Interior for USFWS [†] and Parks, from Governors Kempthorne, Racicot, and Geringer as the three states' formal response on revised alternative G from the March 13 CA meeting
3/23/2000	Draft meeting notes from March 13 CA meeting sent for review to CAs, Pam Buline, field representative for Wyoming Senator Craig Thomas
4/04/2000	Report: "Draft Report National Phone Survey of Attitudes Toward Management of YNP" released to CAs, with request for their comments
4/04/2000	Cooperating Counties letter to Don Barry, Assistant Secretary, as formal comments on revised alternative G from the March 13 CA meeting
4/12/2000	CAs mailed additional comment letters that were not available at the March 13 meeting
4/18/2000	Fax and letter with three page detailed description of revised alternative G to CAs, as requested at May 18, 2000 CA meeting

Date	Event/Action
4/24/2000	Kim Raap, State of Wyoming, letter to Steve Iobst requesting items to be put on agenda of May 18 CA meeting
4/25/2000	Winter entrance statistics sent to Paul Kruse per his request
5/12/2000	Comment summaries and executive summary of comments on DEIS sent to CAs
5/12/2000	Final Report: "Winter 1998-99 Visitor Survey Yellowstone, GTNP, and the GYA" released to CAs
5/18/2000	Meeting with all cooperators in Bozeman, Montana
5/22/2000	Annual "National Parks Day" meeting with the Community of Cody, Wyoming to discuss the Winter Use Plan and the direction the national parks are heading with regard to snowmobile use
5/24/2000	Draft meeting notes from May 18 CA meeting sent for review to CAs, Dalles Scholes-field representative for U.S. Senator Enzi, and Todd O'Hair-field representative for Congressman Hill
6/5/2000	Copies of preliminary FEIS [†] mailed to cooperating agencies for review
6/27/2000	Comments from cooperating agencies on preliminary FEIS due

[†]USFS=U.S. Forest Service; YNP=Yellowstone National Park; GTNP= Grand Teton National Park; GYA=Greater Yellowstone Area; USFWS=U.S. Fish and Wildlife Service; CA=Cooperating Agencies.

Other meetings that pertained to Winter Use are described below.

Since 1995, Yellowstone National Park (YNP) has been party to an agreement sponsored by the Gallatin County, Montana Commissioners "Concerning a Coordinated Ecosystem Approach to Planning in Gallatin County" that includes the U.S. Forest Service (USFS), Bureau of Land Management, City of Bozeman, Montana Fish, Wildlife, and Parks, and the Montana Department of State Lands. Park staff usually attends the thrice-yearly meetings, and winter use has been a typical update or discussion subject at most sessions since mid-1997.

Superintendents from Grand Teton and Yellowstone National Parks, Forest Supervisors from the Gallatin, Targhee-Caribou, Beaverhead-Deerlodge, Bridger-Teton, Shoshone, and Custer National Forests, and the Manager of the National Elk Refuge are part of the Greater Yellowstone Coordinating Committee (GYCC). The interagency winter use assessment was sponsored by the GYCC, and the new Winter Use Plan and EIS have been discussed since 1998.

THE DRAFT PRELIMINARY ALTERNATIVES

The alternatives for this EIS were formulated by the NPS in accordance with the CEQ Regulations to use the proposals of cooperating agencies "to the maximum extent possible consistent with its responsibility as lead agency." A series of alternative concepts workshops were held with the cooperating agencies and NPS representatives on the local and regional levels (40 CFR §1501.6(a)(2)). On October 14-16, 1998, the NPS hosted an alternatives concept workshop in Idaho Falls, Idaho. Representatives from all nine cooperating agencies were broken into five interagency teams that also included the NPS representatives. The primary role of the NPS representatives was to provide technical expertise in areas such as park operations and wildlife management. Teams were provided with documents regarding the dictates of federal law and Park Service mission and policy. Groups clarified the issues identified through the scoping process and formulated and mapped their own set of management actions and alternatives.

At the conclusion of the workshop, a representative presented each group's alternatives concepts to the entire assembly. Final presentations were recorded on two audiotapes that were subsequently transcribed. The following is a list of ideas for actions that emerged from that workshop with the cooperating agencies. Ideas have been categorized by goal and/or subject.

COOPERATING AGENCY ALTERNATIVES CONCEPTS

Increase access and affordability through road plowing:

- Plow the road from West Yellowstone, Montana to Old Faithful with no snowmobile route alongside
- Plow the road from West Yellowstone to Old Faithful with snowmobile route alongside
- Plow the road from West Yellowstone to Old Faithful and allow mass transit (snowcoach) only throughout the rest of the park
- Plow the roads from Madison to Norris, West Yellowstone, Montana to Old Faithful
- Do not plow the road from Colter Bay to Flagg Ranch (groomed snowmachines route instead)
- Plow the Teton Park Road from Moose to Jackson Lake Junction

Encourage/discourage use by season or time:

- Lengthen the winter season
- Allow only snowcoaching and skiing during the last two weeks of season
- Keep roads open only during daylight hours

Encourage/discourage use by grooming or maintenance levels:

- Maintain all groomed surfaces more frequently for improved visitor experiences
- Groom Grassy Lake Road more frequently
- Groom Grassy Lake Road less frequently
- Groom west side routes less frequently
- Groom fewer ski trails
- Do not groom ski trails in either park
- Attach grooming machine to the back of snowcoaches

Encourage/discourage use levels via facilities:

- Initiate overnight lodging at Canyon/Lake/Jackson Lake Lodge
- Provide additional low-cost accommodations at Old Faithful
- Reduce overnight accommodations at Old Faithful
- Create a backcountry hut system
- Upgrade/create additional warming huts/restrooms
- Concentrate amenities at entrance points to the parks--Center of parks provide a "wilderness island experience"

Increase diversity of opportunities:

- Introduce motorized and nonmotorized zones to Yellowstone Lake
- Initiate sleigh rides at Mammoth Hot Springs
- Groom campground roads for skiing
- Groom ski trails near major destination areas in both parks
- Do not groom Teton Park Road and Moose-Wilson Road—allow only nonmotorized use there
- Open Grassy Lake Road to outfitters

Encourage/discourage use by adding, changing, and/or eliminating additional/alternative motorized routes:

- Create new route through Bechler area to Old Faithful

- Open Potholes area to motorized use
- Open off-trail motorized play areas at Jackson Lake, the Parkway, and the southwest quadrant of YNP below the Continental Divide
- Move the Continental Divide Snowmobile Trail (CDST) to utility corridor
- Open utility corridors at Slough Creek to motorized use
- Open utility corridors at Yellowstone Lake to motorized use
- Close the CDST through Grand Teton National Park (GTNP)

Initiate and/or encourage alternative transportation, such as mass transportation:

- Create a “hyper-car” alternative (similar to monorail) to destination points
- Remove snowmobiling, institute oversnow mass transit only
- Create subsidized oversnow shuttle to increase access and affordability

Wildlife closures/restrictions to use:

- Prohibit recreation in winter wildlife range
- Prohibit stopping/getting off machines or leaving trail/designated routes
- Allow hunting by Native Americans to curb ungulate populations
- Allow skiing in winter range, mitigate through education
- Post wildlife migrations daily, adjust visitor use patterns/routes accordingly
- Eliminate ski trail at Blacktail Plateau

Adaptive management:

- Utilize adaptive wildlife management

General:

- Physically separate motorized from nonmotorized uses
- Prohibit motorized use on Jackson Lake
- Prohibit snowplanes on Teton Park Road
- Work with states and local communities to coordinate visitor recreation opportunities

Require clean and quiet machines:

- Phasing concept:
2000/2001 ethanol/methanol and synthetic fuels only sold in park;
2001/2002 green machines required for all commercial trips;
2008/2009 all green machines
- Phasing concept:
2 to 5 years alternative fuels and lubes;
5 years direct two-stroke and alternative fuels and lubes;
10 to 20 electric or hybrid fuel cell;
- Require clean, quiet machines on all park roads
- Increase emphasis on emission and sound controls
- Continue to use today’s emissions and sound standards
- Require clean, quiet snowmachine use on Jackson Lake and West Thumb
- Require clean, quiet motorized use on Teton Park Road
- Initiate a progressive 5 year sound abatement program
- Mandate new technology as it becomes available

Implement permits, reservations, and/or fees through the following mechanisms:

- Differential pricing: e.g., reduce entrance fees during slower seasons
- Fee increases to manage use levels
- Use limitations (number of visitors)

- Permit/reservation system
- Safety certification
- A cap on snowmobile numbers at current levels of use

After the October alternatives concepts workshop, representatives from the NPS held similar workshops with the NPS employees at the local and regional levels. From the meetings, representatives formulated an initial set of draft preliminary alternatives based on the concepts and ideas generated at all the workshops and during public scoping.

COOPERATING AGENCY ALTERNATIVES CONCEPTS INCLUDED IN THE INITIAL DRAFT PRELIMINARY ALTERNATIVES

Many innovative suggestions or comments by the cooperating agencies were incorporated into the purpose and need for action. While formulating the draft preliminary alternatives, representatives of the NPS reviewed all of the management actions listed above, as well as those suggested by the NPS employees in workshops held in YNP and GTNP for:

- a) relevance to the purpose, need, and scope of the document,
- b) contribution to its goals, and
- c) accordance with the dictates of federal law and the Park Service mission

Many of the ideas generated at the workshop were included in the draft preliminary alternatives that were distributed to the cooperating agencies on November 20, 1998. Below is a list of those ideas, indexed according to the letter-name of the draft preliminary alternatives in which they appeared.¹

Sixty-eight percent of the ideas generated at the alternatives concept workshop that were within the scope of the purpose and need of this EIS, and could potentially help to resolve that need, appeared in the initial set of draft preliminary alternatives.

Increase access and affordability through road plowing (4 of 7):

- Plow the road from West Yellowstone, Montana to Old Faithful and allow all-wheeled vehicles with no snowmobile route alongside; A
- Plow the road from West Yellowstone to Old Faithful and allow all-wheeled vehicles with snowmachine route alongside; A
- Plow the roads from Madison to Norris, West Yellowstone, Montana to Old Faithful; A
- Do not plow the road from Colter Bay to Flag Ranch (groomed snowmachines route instead); B, C

Encourage/discourage use by season or time (2 of 3):

- Allow only snowcoaching and skiing during last two weeks (changed to “month,” in certain area) of season; A
- Keep roads open only during daylight hours; B, C (lower nighttime limit), D

¹ The initial set of draft preliminary alternatives (released November 20, 1998) included four alternatives, and the revised set (released April 19, 1999) included seven. The alternatives common to the two sets are similar but not identical. The three remaining alternatives in the revised set include a no action alternative and two alternatives whose elements were drawn from the initial set of alternatives. The two alternatives sets generally correspond as follows, with the initial set listed first: A=C, B=D, C=E, and D=F. These letters correspond to the initial set of draft preliminary alternatives, rather than the letter-names of the revised draft preliminary alternatives.

Encourage/discourage use by grooming or maintenance levels (3 of 7):

- Maintain all groomed surfaces more frequently for improved visitor experiences; A
- Groom Grassy Lake Road less frequently; B
- Groom Grassy Lake Road more frequently; A

Encourage/discourage use levels via facilities (1 of 6):

- Upgrade/create additional warming huts/restrooms; A, B

Increase diversity of opportunities (2 of 6):

- Groom campground roads for skiing; A, B
- Groom ski trails near major destination areas in both parks A, B

Encourage/discourage use by adding, changing, and/or eliminating additional/alternative motorized routes (3 of 7):

- Move the CDST to utility corridor (or away from road); A, B
- Open utility corridors in Lake/Fishing Bridge area to motorized use; A
- Close the CDST through GTNP (provide shuttle service); C

Initiate and/or encourage alternative transportation, such as mass transportation (1 of 3):

- Create subsidized oversnow shuttle to increase access and affordability; B

Wildlife closures/restrictions to use (2 of 6):

- Prohibit recreation in winter wildlife range; C, D
- Prohibit stopping/getting off machines or leaving trail/designated routes; D

Adaptive management (1 of 1):

- Utilize adaptive wildlife management; C

General (2 of 4):

- Separate uses; A, B
- Prohibit motorized use on Jackson Lake; C, D

Require clean and quiet machines (4 of 7):

- Phasing concept; A, B, D
 - 2000/2001 ethanol/methanol and synthetic fuels only sold in park (changed to 2001/2002 to allow grace period for implementation);
 - 2001/2002 green machines required for all commercial trips (changed to 2002/2003 to allow grace period for implementation);
 - 2007/2008 all green machines
- Require clean, quiet machines on all park roads; B, D
- Increase emphasis on emission and sound controls; A, B, C
- Mandate new technology as it becomes available; C

Implement permits/reservations/fees:

- Implement safety program; B

**IDEAS CONSIDERED BUT NOT INCLUDED IN THE INITIAL DRAFT
PRELIMINARY ALTERNATIVES**

Ideas that were considered but not incorporated into the initial draft preliminary alternatives fell into four categories.

- A. Outside the scope of the purpose and need of this EIS and/or within the scope of a concurrent EIS,

- B. Outside the scope of the purpose and need for this EIS and/or illegal according to federal statute or Executive Order,
- C. Outside the scope of a programmatic plan, or
- D. Not effective means for resolving the need and meeting the objectives of this EIS (see the NPS Director's Order 12, Sec. 207(B), "Reasonable Alternatives").

Ideas that fall into each category are discussed below.

A. Management actions outside the scope of the purpose and need of this EIS and/or within the scope of a concurrent EIS:

- 1. Initiate overnight lodging at Canyon/Lake/Jackson Lake Lodge
- 2. Provide additional low-cost accommodations at Old Faithful
- 3. Reduce overnight accommodations at Old Faithful
- 4. Create a backcountry hut system
- 5. Initiate sleigh rides at Mammoth Hot Springs
- 6. Open the Grassy Lake Road to outfitters

Because all of these actions refer to activities or services to be conducted in the park by private parties charging a fee, they specifically fit the definition of commercial services, and so would be more appropriately addressed in a Commercial Services Plan (CSP). The CSPs for all three park units are currently in process. This also becomes clear in examining the purpose, need, and scope of each plan; whereas the scope of the Winter Use Plans/EIS requires that it focus on "desired resource conditions and experiences, rather than on the details of how they should be achieved," the CSP is specifically designed to determine a) what types of services and facilities are appropriate to the National Park, and b) what levels of appropriate services and facilities are necessary to serve visitors (Project Agreement, Winter Use Plans/EIS for Yellowstone and Grand Teton National Parks and the John D Rockefeller, Jr., Memorial Parkway; Grand Teton Commercial Services Plan; Draft Yellowstone Commercial Services Plan, 1/8/98). Further, the current draft preliminary winter use plans alternatives are consistent with the management action in the Commercial Services Plan, and some of the ideas listed here are currently being analyzed in the Environmental Assessment which will accompany the CSPs.

B. Management actions outside the scope of the purpose and need for this EIS and/or illegal according to federal statute or Executive Order:

- 1. Create new route through Bechler area to Old Faithful
- 2. Open Potholes area to motorized use
- 3. Open off-trail motorized play areas at the Potholes, the Parkway, and the SW quadrant of YNP below the Continental Divide
- 4. Allow hunting by Native Americans in order to curb ungulate populations

Because the area suggested for development in management action 1 has been recommended for wilderness designation, implementation of that action would constitute a violation of several

federal statutes and policies that govern the NPS.² Section 6:3 of the NPS Management Policies states that:

The Park Service will take no action that would diminish the wilderness suitability of an area recommended for wilderness study or for wilderness designation until the legislative process has been completed.

Executive Order (EO) 11644 (Amended 11989) states that:

(4) Areas and trails shall not be located in officially designated wilderness or primitive areas. Areas and trails shall be located in areas of the National Park system, Natural areas or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off road vehicle use in such locations will not adversely effect their natural, aesthetic, or scenic values.

The Code of Federal Regulations (CFR 1, Sec. 2.18) states that:

The use of snowmobiles is prohibited, except on designated routes and water surfaces that are used by motor vehicles or motorboats during other seasons. Routes and water surfaces designated for snowmobile use shall be promulgated as special regulations. Snowmobiles are prohibited except where designated and only when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources.

Implementation of actions 2 and 3 would similarly violate EO 11644 (Amended 11989) and 36 CFR 1, Sec. 2.18. Park staff members also believe that these actions could lead to serious adverse resource impacts, particularly in geothermal areas. It is possible that some of these management actions would be contrary to the Purpose and Need statement of this plan, which states that “winter recreation within Grand Teton and Yellowstone National Parks should complement or remain subordinate to the unique aspects of each landscape within the ecosystem” (Project Agreement, Winter Use Plans/EIS for Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway).

Implementation of action 4 would constitute a violation of 36 CFR 1, Sec. 2.2, which prohibits hunting in the National Parks except for the JDRMP. Instituting this action is also beyond the scope of this EIS, as it would require the establishment of a wildlife carrying capacity for YNP, a topic that would be more appropriately addressed in a resource or wildlife management plan.

C. Management actions outside the scope of a programmatic plan:

1. Attach grooming machines to the back of snowcoaches
2. Implement differential pricing. For instance, reduce entrance fees during slower seasons
3. Implement fee increases to manage use levels

² Related to the subject of human development, the federal Wilderness Act (1964) defines “wilderness” as “an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable” (Wilderness Act, 78 Stat. 987, 1964).

As outlined in the Director's Order 2: Park Planning, there are four levels of planning in which the NPS engages: General Management, Strategic, Implementation, and Annual Performance. The scope of this document places it within the category of General Management Planning, which focuses on "why the park was established and what resource conditions and visitor experiences should be achieved and maintained over time" (Director's Order 2: Park Planning; USDOJ; May, 1998, p5). Because they deal specifically with methods by which goals could be achieved, the management actions listed here would be more appropriately considered in an Implementation Planning document. According to the NPS planning policy, "implementation planning will usually tier from a general management plan, or its equivalent, and it will analyze and describe specific actions and locations for meeting a plan objective. As is outlined in its Purpose and Need and Scope, this EIS is designed to develop a programmatic plan for achieving long-term goals rather than establishing site specific actions or actions that do not require EIS analysis for approval (such as speed limits, signing or enforcement actions).

D. Management actions that were determined ineffective for meeting the objectives of this EIS:

1. Groom west side routes less frequently
2. Introduce motorized and nonmotorized zones to Yellowstone Lake
3. Open utility corridors at Slough Creek to motorized use
4. Groom fewer ski trails
5. Do not groom ski trails in either park
6. Allow skiing in winter range; mitigate through education
7. Post wildlife migrations daily, adjust visitor use patterns/routes accordingly
8. Create a backcountry hut system
9. Create a "hyper-car" alternative (similar to monorail) to destination points
10. Prohibit snowplanes on Teton Park Road
11. Create a "wilderness island" experience

Management actions 1 and 2 would not effectively contribute to the goals of the EIS because their implementation would pose significant safety risks to park visitors. Due to the volume of visitors entering the park from the West Entrance (48% of all winter recreational visitors from December 1994-March 1999), action 1 could cause dangerously poor road conditions, and make even periodic grooming very difficult (Monthly Travel Data Reports, YNP Visitor Services Office). Action 2 is impracticable because the Lake's many thermal features and rapidly changing ice conditions make it unsafe for winter use activities. In spite of YNP's extreme climate, some areas of Yellowstone Lake remain ice-free throughout the winter. For instance, at Mary Bay/Sedge Bay, hydro-thermal vents, some located only 20 feet beneath the Lake's surface, produce hot springs of 80 degrees Fahrenheit which often prevent the Lake from ever freezing over near the shoreline (Charles Remsen, J. Val Klump, Jerry Kaster, Robert Paddock, Patrick Anderson, & James Maki, "Hydrothermal Springs and Gas Fumaroles in Yellowstone Lake, Yellowstone National Park, Wyoming" *National Geographic Research* 6(4): 509-515 (1990); Jerry Kaster, J. Val Klump, & Charles Remsen, "Sub-lacustrine Fumarole Communities in Yellowstone Lake: Naturally-Occurring Hydroponic System" Final Report, National Geographic Society Grant No. 3170-85, University of Wisconsin—Milwaukee Center for Great Lakes Studies, (no date), 2-4). West Thumb is another highly active thermal area, and geothermal studies conducted during the 1980s indicate that hydro-thermal springs may be a widespread

phenomenon throughout the Lake (Kaster, Klump, & Remsen, “Sub-lacustrine Fumarole Communities in Yellowstone Lake,” 4). In the winters of both 1997-98 and 1998-99, the Lake inexplicably froze and then thawed in the middle of the winter (Will Rizzo, “Park officials ponder unfrozen lake” *Livingston Enterprise*, February 17, 1999).

Because Slough Creek is accessed via the plowed road that runs between Gardiner and Cooke City, Montana, potential snowmobilers would have to trailer their machines for 24-29 miles in order to take a very brief ride. The Slough Creek area has several other drawbacks, including:

- The area has been identified by biologists as important wildlife winter range
- Snow cover is unreliable at its lower elevation
- Other utility corridors were proposed for this use in the initial draft alternatives

Actions 4, 5, 6, and 7 were proposed as ways to reduce impacts to wildlife. However, because research has found that animals better adapt to well-defined areas of concentrated use than to intermittent use patterns, none of these actions would produce a significant benefit toward realizing this goal. Action 7 is being explored on a seasonal basis, but is problematic due to the difficulty of tracking wildlife on a daily basis. Also, evidence of grooming for visitor use can remain on the snow surface for lengthy periods, and so redirecting visitor use on a daily would appear to represent a greater impact on wildlife.

Constructing a series of backcountry huts and connecting trails would appear to be inconsistent with management prescription 11 for this EIS, which addresses backcountry areas where use is permitted. Prescription 11 states not only that backcountry areas must have “no facilities,” but also must “generally appear natural and untouched by humans,” with “little to no evidence of resource modification” (Management Prescriptions matrix for Draft Preliminary Winter Use Alternatives). Facilities for overnight lodging are included only in prescription 1, which addresses destination areas. It is questionable at this time whether these additional facilities would be utilized to such an extent as to justify their addition. In winter 1996-97, the existing 10-yurt camp at Canyon logged only 418 user days, and only 114 backcountry permits were issued (YNP Concessions Office, YNP Backcountry Office). Should the demand arise for this use, temporary yurt facilities could be considered for other areas and administered through concession plans following additional environmental analysis.

Although the benefits of action 9 might eventually prove to be attractive and substantial, the NPS must consider cost-effective alternatives for this EIS. Implementation costs of action 9 would be enormous, and because a hyper-car system would require year-round implementation, this action would be best addressed in a general management plan. Also, YNP’s topography is not as conducive to the implementation of such a system as is the topography of other parks where rail systems have already been installed. For instance, in certain parts of the park such as Sylvan Pass, the permanent elevated track of the system would be highly vulnerable to occasional avalanches. As a result, safety considerations and maintenance costs (on top of the initial building and implementation costs) would be major concerns. This management action is technically and economically unfeasible at the current time (see the NPS Director’s Order 12, Sec. 207(B), “Reasonable Alternatives”).

The idea of creating a “wilderness island” experience (action 11) was considered for incorporation into the alternatives, but determined to be undesirable because of a considerable increase in the cost of visitor access to the park. Individuals without personal snowmobiles would pay for two forms of transport; a full day’s snowmobile rental as well as a snowcoach tour.

However, elements of this concept have been incorporated into several of the alternatives. Alternatives C and D separate uses through timing and zoning, and alternative F closes park roads at sunset. Visitors engaging in nighttime activities in YNP would also have to spend the night in the Park’s interior under alternative F.

COOPERATING AGENCY COMMENTS ON PRELIMINARY ALTERNATIVES

Cooperating agency representatives were asked to submit their comments on the draft preliminary alternatives by December 7, 1998. Those comments appear below:

- Accompany road closures with road openings
- Assess possible changes in recreational use and distribution under each alternative
- Assess possible use/demand changes in gateway communities under each alternative
- Change “biodegradable lubricants” to “synthetic low-emission lube oils”
- Change “ethanol/methanol” to “10% ethanol blend”
- Change “hypercar” to “cybercar”
- Clarify all concept statements
- Clarify that alternative A will maximize *opportunities*, not *use*
- Clarify why the NPS might consider re-opening roads to snowcoaches only in D
- Clarify/improve proposed methods of measuring decibel and emissions levels
- Consider effects on National Forests if dirty sleds and February traffic are displaced to them
- Define “natural quiet”
- Define “unnatural wildlife migrations”
- Develop an alternative D for GNTP
- Develop more nonmotorized trails
- Discuss ideas which were eliminated because they were judged to be implementation questions
- Discuss ideas which were eliminated because they were judged to be illegal or beyond the scope of the EIS
- Do not close the CDST from the east boundary to Colter Bay
- Do not introduce subsidized snowcoach service
- Ensure that any plowing of the road from West Yellowstone to Old Faithful is accompanied by a snowmobile trail alongside it
- Establish a strategy for resolving user conflicts
- Establish backcountry huts
- Establish measurable and scientific standards for management
- Establish quantitative measures which express the essential elements of the EIS’s purpose, and allow for comparison between the current state and those which would be provided under the alternatives
- Establish wildlife carrying capacity
- Expand lodging and eating facilities to include Lake, Canyon, and Grant Village
- Form cooperative associations with gateway communities in order to fully inform visitors about the range of winter recreational opportunities
- Give CA’s the opportunity to review/comment upon/repeat results of all scientific studies related to road closures

- Increase internal facilities
- Justify East Entrance closure
- Justify nighttime road closure
- Let the cooperating agencies decide whether illegality is actually an impediment to consideration
- Make GTNP's alternative C into D, make new C or make alternative B into C, create new B
- Move closing the Grassy Lake Road to alternative D
- Move closure of Jackson Lake to alternative D
- Move nighttime road closure to alternative C, nighttime speed limit to B
- Move the East Entrance road closure action to alternative D
- Offer alternative which leaves CDST in road ditch
- Open Dunraven Pass
- Open the CDST and Grassy Lake Roads to outfitters
- Provide a full-scale no action alternative for examination
- Provide more detail about the proposed location of interior campsites and new warming huts
- Reconsider the idea of reducing lodging at Old Faithful
- Remove part in A about limiting February travel from Fishing Bridge to Norris snowcoaches
- Remove part in A about plowing from Madison to Mammoth
- Remove references to the nearby availability of places where people can engage in activities similar to those which would be prohibited in the parks
- Separate consideration of water quality, emissions, and sound issues
- Specify how visitor uses will be separated
- Specify issues/needs being addressed under each alternative
- Specify what indicators and standards will be used for determining visitor carrying capacity, and how those standards would guide implementation
- Speculate about what effects might result from adaptive management possibilities
- Stop "hiding behind the CFR"
- Vary season length

The comments of the cooperating agencies proved helpful as the NPS continued to revise the alternatives. The following changes were not necessarily a direct response to suggestions made by the cooperating agencies, but they address the agencies' input at this stage. The parenthetical addition in each bulleted comment indicates a change that NPS made.

- Change "biodegradable lubricants" to "synthetic low-emission lube oils" (language changed)
- Change "ethanol/methanol" to "10% ethanol blend" (language changed)
- Clarify all concept statements (clarified/expanded)
- Clarify that alternative A will maximize opportunities, not use (language changed from "access" to "opportunities")
- Clarify why the NPS might consider re-opening roads to snowcoaches only in D (language changed to reflect consideration of unspecific "reopening")
- Clarify/improve proposed methods of measuring decibel and emissions levels, do not rely on automobile standards (clarified, changed)
- Define "natural quiet" in alternative B (D) (language eliminated)
- Do not introduce subsidized snowcoach service (element eliminated)
- Form cooperative associations with gateway communities in order to fully inform visitors about the range of winter recreational opportunities (alternatives B, C, D, F, and G all now include language about forging partnerships with gateway communities in efforts to inform visitors about the full range of available winter recreation opportunities)

- Provide a full-scale no action alternative for examination (*Provided by revised alternative A*)
- Provide more detail about the proposed location of interior campsites and new warming huts (*provided*)
- Separate consideration of water quality, emissions, and sound issues (*separated*)
- Vary season length (alternatives B and C both include this element)

Many of the remaining comments involved issues that are addressed above. Other comments requested that the sort of analysis provided in the Draft EIS be provided within the text of the alternatives. Other comments request unconditional implementation of suggestions that have been dismissed with rationale by the NPS (such as the comment that a plowed road from West Yellowstone to Old Faithful “must” be accompanied by a snowmobile trail alongside it).

FORMULATION OF ALTERNATIVES

The preliminary draft alternatives were the focus of a January 1999 workshop process called “Choosing by Advantages.” Participants included the NPS representatives from local (YNP), regional (Denver Service Center), and national (Washington, D.C.) offices. CBA is a decision-making process based on advantages of different alternatives for a variety of factors or goals. The advantages are weighed and summarized to help identify the preferred alternative. In the “Choosing by Advantages” (CBA) process, the work group assigns a quantitative value to each element of each existing alternative in terms of its relative advantage over all of the parallel elements from other alternatives. (In this case, the original alternatives were evaluated in terms of visitor enjoyment and opportunity, resource protection, effects on local communities, and safety). The elements are evaluated in terms of lifecycle costs. Finally, each alternative is assigned a total score that is charted onto an axis against its projected lifecycle costs. Desirable alternatives feature high total scores and low lifecycle costs. In this case, the preliminary draft alternative with the highest total score also had the highest projected lifecycle cost. The NPS drew from existing alternatives to:

- Replace the highest-scoring alternative’s most costly elements with less costly elements which were designed to fulfill similar needs but were not substantially lower in score than the more expensive elements which they replaced, and
- Ensure that the best combinable ideas from each alternative were included in the Preferred alternative.

Alternative B resulted from this process, and combines ideas and elements of the four preliminary draft alternatives to provide the most benefit for the dollars expended over time.

The revised draft preliminary alternatives still contain many ideas from both the initial alternatives and the October cooperating agencies workshop. Following is a list of ideas generated at the cooperating agencies workshop which were included in the revised preliminary alternatives, indexed according to the letter-name of the revised draft preliminary alternative/s in which they appeared. The proportion of ideas appearing in the revised draft preliminary alternatives to the total number of ideas generated in each category has been noted. Based on these numbers, 76% of the ideas generated at the workshop (which were within the scope of the purpose and need of this EIS and could potentially help to resolve that need) appeared in the revised draft preliminary alternatives. [Note: This number increases when overlapping suggestions and those which were either outside the scope of this document or contrary to federal

statute are excluded from the calculation.] However, these numbers have been included only as representations and not quantitative indicators.

Increase access and affordability through road plowing (3 of 7):

- Plow the road from West Yellowstone, Montana to Old Faithful and allow all-wheeled vehicles with no snowmobile route alongside; B, C
- Plow the roads from Madison to Norris, West Yellowstone, Montana to Old Faithful; C
- Do not plow the road from Colter Bay to Flagg Ranch (groomed snowmachines route instead); D

Encourage/discourage use by season or time (3 of 3):

- Allow only snowcoaching and skiing during last two weeks (changed to “month,” in certain area) of season; C
- Keep roads open only during daylight hours; B, D, E (lower nighttime limit), F, G
- Lengthen the season; B, C

Encourage/discourage use levels via facilities (1 of 6):

- Upgrade/create additional warming huts/restrooms; B, C, D, G

Increase diversity of opportunities (2 of 6):

- Groom campground roads for skiing; B, C
- Groom ski trails near major destination areas in both parks; B, C, D, G

Encourage/discourage use via adding/changing/eliminating additional/alternative motorized routes (3 of 7):

- Move the CDST to utility corridor (or away from road); B, C, D
- Open utility corridors in Lake/Fishing Bridge area (changed to Norris) to motorized use; C
- Close the CDST through GTNP (provide shuttle service); E, F

Initiate/encourage alternative/mass transportation (1 of 3):

- Limit oversnow motorized travel to snowcoaches; G

Wildlife closures/restrictions to use (2 of 6):

- Prohibit recreation in winter wildlife range; B, D, E, F
- Prohibit stopping/getting off machines or leaving trail/designated routes; F

Adaptive management (1 of 1):

- Use adaptive wildlife management; B, E

General (3 of 4):

- Separate uses; C, D
- Prohibit motorized use on Jackson Lake; B, E, F, G
- Work with gateway communities to inform visitors of the full range of winter recreation opportunities; B, C, D, F, G

Require clean and quiet machines (4 of 7):

- Phasing concept: B, D 2000/2001 ethanol/methanol and synthetic fuels only sold in park (changed to 2001/2002 to allow grace period for implementation); 2001/2002 green machines required for all commercial trips (changed to 2002/2003 to allow grace period for implementation); 2007/2008 all green machines
- Require clean, quiet machines on all park roads; B, D, F, G
- Increase emphasis on emission and sound controls; B, C, D, F, G

- Mandate new technology as it becomes available; B, F, G

Implement permits/reservations/fees (2 of 6):

- Implement safety program; B, D
- Implement reservation system; B

Two important elements of the initial draft preliminary alternatives that did not appear in the revised draft preliminary alternatives included a) plowing the road from West Yellowstone to Old Faithful and establishing a snowmobile route alongside the road, and b) instituting a subsidized snowcoach system. Both these ideas have attractive aspects. It was determined, however, that establishing such a bi-modal transportation route on the West Yellowstone-Old Faithful road would create safety hazards. The cost of both grooming and plowing on the road from West Yellowstone would be twice as costly as current operations. The lifecycle costs of a subsidized snowcoach system made that action similarly unfeasible (see the NPS Director's Order 12, Sec. 207(B), "Reasonable Alternatives").

The revised preliminary draft alternatives were distributed to the cooperating agencies on April 20, 1999 for a review during the comment period. The Agencies were required to submit their comments, as well as analyses of impacts in their specific areas of expertise, to the NPS by May 24, 1999. In response to this deadline, Senators Conrad Burns, Michael Crapo and Larry Craig sent a letter of request to the NPS Director Robert Stanton expressing their desire that the Agencies be allowed more time for review, comment, and production for analysis. Because of the tight, court-dictated time schedule governing the EIS, the NPS was unable to honor that request.